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April 26, 2022

BY ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Caswell Senior*, S6 20 Cr. 626 (PMH)

Dear Judge Halpern:

We write to respectfully request that the plea currently scheduled for Thursday, April 28, 2022, be adjourned for one week or to a date convenient for the Court. We have been working diligently to prepare for the plea, however, there remain issues that must be resolved. As we fully expect the plea to proceed, we also request permission to withdraw the motions previously filed on behalf of Mr. Senior and we consent to the continued exclusion of time for speedy trial purposes. We have consulted with the Government concerning this request and we expect to move forward with the plea on a date convenient for the Court.

Thank you for your courtesy and consideration and we apologize for any inconvenience precipitated by this request.

Respectfully submitted,

/s/

James Kousouros, Esq.

c.c. All Counsel (by ECF)